

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Morgan, Lewis & Bockius LLP hereby appears in the above-referenced chapter 11 case as counsel to Michael Prendergast (“Prendergast”) and Jeffrey Dwyer (“Dwyer”), and pursuant to Rules 2002, 3017 and 9010 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. § 1109(b), request that all notices given or required in these cases, and all documents, and other papers served in these cases, be given to and served upon:

Jody C. Barillare (Bar No. 5107)
Morgan, Lewis & Bockius LLP
1201 N. Market Street, Suite 2201
Wilmington, Delaware 19801
Telephone: (302) 574-3000
Facsimile: (302) 574-3001
jody.barillare@morganlewis.com

John C. Goodchild, III
Matthew C. Ziegler
Morgan Lewis & Bockius LLP
2222 Market Street
Philadelphia, PA 19103-3007
Telephone: (215) 963-5000
Facsimile: (215) 963-5001
john.goodchild@morganlewis.com
matthew.ziegler@morganlewis.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules specified above but also includes, without limitation, all other notices, papers, reports, orders, agenda letters, applications, motions, petitions, pleadings, requests, complaints or demands, statements of affairs, operating reports, schedules of assets and liabilities whether formal or informal, whether written or oral, and whether transmitted or conveyed by the United States, overnight or electronic mail, facsimile, courier, telephone, telegraph, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and any subsequent appearance, pleading, claim, or suit is not intended, and shall not be deemed or construed, to be a waiver of any of the rights of Prendergast and Dwyer including, without

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

limitation (i) the right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) the right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) the right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) Prendergast and Dwyer's right to enforce any contractual provision with respect to arbitration; or (v) any other rights, claims, actions, or defenses to which Prendergast and Dwyer are or may be entitled to under agreements, in law, or in equity, all of which rights, claims, actions and defenses expressly are reserved.

Dated: July 31, 2025
Wilmington, DE

MORGAN, LEWIS & BOCKIUS LLP

/s/ Jody C. Barillare
Jody C. Barillare (Bar No. 5107)
1201 N. Market Street, Suite 2201
Wilmington, DE 19801
Telephone: (302) 574-3000
jody.barillare@morganlewis.com

- and -

John C. Goodchild, III (*pro hac vice*
pending)
Matthew C. Ziegler (*pro hac vice* pending)
2222 Market Street
Philadelphia, PA 19103-3007
Telephone: (215) 963-5000
john.goodchild@morganlewis.com
matthew.ziegler@morganlewis.com

*Counsel to Michael Prendergast and Jeffrey
Dwyer*

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July 2025, a true and correct copy of the foregoing *Notice of Appearance and Request for Service* was sent via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Jody C. Barillare
Jody C. Barillare, Esq.